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*Attorneys for Participating Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**DECLARATION OF HELEN DAVIS CHAITMAN**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel to the Participating Claimants in this profit-withdrawal proceeding. I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in connection with Participating Claimants' Memorandum of Law in Opposition to the Trustee's Motion *in Limine* to Exclude Testimony of Robert Blecker.

3. Annexed hereto as **Exhibit A** are true and correct excerpts from the April 18, 2017 Transcript of Proceedings held before the Honorable Stuart M. Bernstein, U.S.B.J.

4. Annexed hereto as **Exhibit B** is a true and correct copy of the May 8-9, 2017 email exchange between Helen Davis Chaitman, Esq. and Amy Vanderwal, Esq., in which Participating Claimants offered the Trustee the opportunity to depose Robert Blecker.

5. Annexed hereto as **Exhibit C** is a true and correct copy of the June 22, 2017 email from Amy E. Vanderwal, Esq. regarding Robert Blecker's deposition.

I declare under penalty of perjury that the foregoing is true and correct.

January 12, 2018

/s/ Helen Davis Chaitman

Helen Davis Chaitman

**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2018, I caused a true and correct copy of the foregoing document to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

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